

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

KHALID M. TURAANI,

Plaintiff,

v.

JEFFERSON B. SESSIONS, III, in his  
capacity as Attorney General of the  
United States of America;

CHRISTOPHER A. WRAY, in his  
official capacity as Director  
of the Federal Bureau of Investigation;

CHARLES H. KABLE, IV, in his  
official capacity as Director of the  
Terrorist Screening Center; THOMAS  
E. BRANDON, in his official capacity  
as Deputy Director of the Bureau of  
Alcohol, Tobacco, Firearms and  
Explosives; and UNNAMED AGENT,  
in his or her individual capacity as FBI  
agent,

Defendants.

Case No. 2:17-cv-14112-GAD-RSW

**UNOPPOSED EX PARTE APPLICATION FOR LEAVE TO EXCEED  
PAGE LIMIT**

Now comes undersigned counsel for Defendants, and pursuant to Local Civil Rule 7.1(d)(3)(B), Defendants respectfully apply to this Court for leave to exceed the 7-page limit for reply briefs set forth in the local rules by two (2) additional pages in their forthcoming reply in support of their motion to dismiss, currently

due to this Court on May 23, 2018.<sup>1</sup> Defendants contacted counsel for Plaintiff, who represented that Plaintiff has no objection to this application.

The reason these additional pages requested are necessary is primarily due to the length and complexity of the Plaintiff's complaint. Plaintiff's 29-page complaint contains 142 paragraphs of factual allegations, and six separate causes of action, including multiple constitutional claims, centering primarily around the "constructive denial" of his rights when he alleges that he was not able to purchase a firearm. Plaintiff's response in opposition, ECF No. 12, addresses and raises substantive points regarding five of the six causes of action, and Defendants are unable to adequately respond to these points and cite the court to the relevant factual and legal issues within the 7-page limit.

For the foregoing reasons, Defendants respectfully request leave from this Court to exceed this limit by two (2) pages, for a total of nine (9) pages, so that they can fully present their legal arguments to this Court.

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<sup>1</sup> Defendants' reply was due on May 10, ECF No. 13, but was stricken from the record on May 17 for failure to comply with the 7-page limit required by the local rules with instructions to re-file the reply by May 23, ECF No. 14. Undersigned counsel regrets the error.

Respectfully submitted,

CHAD A. READLER

Acting Assistant Attorney General, Civil Division

JOHN R. TYLER

Assistant Director, Federal Programs Branch

s/ Martin M. Tomlinson

MARTIN M. TOMLINSON (SC Bar No. 76014)

Trial Attorney

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May 23, 2018

Attorneys for Official Capacity Federal  
Defendants

### **CERTIFICATE OF SERVICE**

I hereby certify that on May 23, 2018, I electronically filed a copy of the foregoing Unopposed Ex Parte Application for Leave to Exceed Page Limit.

Notice of this filing will be sent via email to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

/s/Martin M. Tomlinson  
MARTIN M. TOMLINSON  
May 23, 2018